

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

Rev. ANNE ARMSTRONG)
Applicant/Plaintiff)
) Civil Action No.
v)
)
GINA RAIMONDO,)
in her capacity as Governor of Rhode Island,)
and in her personal capacity)
First Defendant)
and)
DEBORAH WHITE, in her capacity as personnel/officer)
of the Rhode Island Division of Capital Asset Management)
and Maintenance,)
and in her personal capacity,)
Second Defendant)

AFFIDAVIT OF REV. ANNE ARMSTRONG

1. My name is Rev. Dr. ANNE ARMSRONG of
99 HUDSON POND ROAD, WEST GREENWICH, RHODE ISLAND, and
I am a retired electrical engineer who currently serves as Deaconess and Mome to “The Healing Church IN RI.” We are the oldest Catholic Congregation in the world and we are in communion with Rome and all other Churches of valid Apostolic Succession.
2. As part of my compulsory religious exercise, I regularly pray rosaries and blow the *Shofar* (Biblical ram’s horn trumpet) to summon angels and amplify prayer in religious expression at the Statehouse, over numerous dates, for years, including on/about December 11 of past

years, as this is the annual date of the standard Catholic Vigil for the next day's Feast of Our Lady of Guadalupe.

3. As part of large religious crowds, I have personally previously witnessed, on numerous occasions over the years, special accommodations being made at the Statehouse for large crowds' free religious expression at the Statehouse, including: (i) crowds large enough in the central Rotunda to strain fire safety badly enough to require Fire Marshalls; and (ii) loud and even amplified speech, song and prayer in Statehouse common areas audible even in closed offices; and (iii) Statehouse access even after normal business hours, sometimes long into the night and into the wee hours of the morning. The most notable are a previous Governor's wife leading annual group rosary prayers at the very spot indicated.
4. I have also witnessed other religious and secular groups being afforded the same accommodations in a free speech context as are the religious groups. When I on or about November 30, 2020 asked Deborah White why I was seeing journalists publishing images of being inside the Statehouse (if the public is not allowed in), and she answered that these professional journalists have been recently allowed in to the Statehouse and will continue to be "because it's official business." This is wrong, because the journalists are no more State officials than I am.
5. My religious practice includes occasional demonstration that the Statehouse dome acoustically amplifies the Divine response to prayer, and we believe that prayers said there and accompanied by ringing the piezoelectric statehouse dome with shofar blasts are essential to our service. This belief is partly religious, and partly expert scientific opinion derived from my career as an electrical engineer combined with correspondence with experts in the matter.
6. This year's Lady of Guadalupe Feast, by my own late November private revelation, is the most important of all due to its unique proximity to the once-in-800-years Christian astronomical event immediately following it, during which the Statehouse Dome's prayer-amplifying acoustic properties must echo a rosary and a Biblical trumpet (shofar) sounding, since the event will not recur in my lifetime. Future prayers on this Feast Day, in future years, as well as other Catholic prayers from time to time, are also necessary to my religious expression -- especially when Biblically-relevant legislative issues such as abortion and freedom of religion arise, but this year's December 11 Catholic celebration is the most important of all.
7. Governor Gina Raimondo, news reported, closed the Statehouse on 3/16 of this year 2020. Deborah White from the Division of Capital Asset Management & Maintenance, who books Statehouse reservations, claimed by telephone to me on or about November 30, 2020, that the Statehouse was closed to the public, which she confirmed via email December 2, 2020 (see ATTACHMENT 1).

8. I was getting ready to sue, to strike down the law under the new SCOTUS ruling about the Brooklyn Catholic Diocese, but I could not find any law allowing the Statehouse to deny me entry at all, let alone deny a special permit. I even contracted Alan Gordon, a qualified legal researcher, to find the relevant law or Executive Order, but he too found none.
9. My planned Statehouse religious exercise is limited to 3 total people (self included), all of the same household, who are more than prepared to follow and even exceed all lawful disease suppression and/or safety measures.
10. I reached out repeatedly, for example by contacting the Capitol Police to ask if they would let me in, and seeking the name, number, or title of the law which allegedly barred public access to the Statehouse, but no one has answered. The Police clearly deferred in writing to the 2nd Defendant/Respondent (see ATTACHMENT 2).
11. When I searched online to see which law closed the Statehouse, a news article from the Providence Journal dated 03-16-2020 at 4:22 pm claimed the Statehouse was shut by an Order that day, but that day's Orders (20-04 and 20-05) do not shut the Statehouse, and merely limit public gatherings to a size larger than the size we proposed, and allow larger official meetings to go online (so long as the public can join online in accordance with State Open Meeting statute), respectively.
12. I believe that force (barred doors inhibiting my choice of movement, and possibly weapons such as pepper spray, handcuffs, tasers, or grappling) are being unlawfully deployed and/or threatened against my church colleagues and I, under color of a law which does not appear to even exist and which seems Unconstitutional even if it does exist under the new SCOTUS Brooklyn Diocese ruling. I am upset about this as a Christian, as a Rhode Islander, as an American, and just as any human being faced with tyranny would and should be.
13. ATTACHMENTS 1 and 2 follow immediately below, in turn followed by my certification under penalty of perjury.